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Attorneys for Defendant  
ELITE CREATORS LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

N.Z., R.M., B.L., S.M., and A.L., individually  
and on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED, FENIX  
INTERNET LLC, BOSS BADDIES LLC,  
MOXY MANAGEMENT, UNRULY AGENCY  
LLC (also d/b/a DYSRPT AGENCY), BEHAVE  
AGENCY LLC, A.S.H. AGENCY,  
CONTENT X, INC., VERGE AGENCY, INC.,  
AND ELITE CREATORS LLC,

Defendants.

Case No. 8:24-cv-01655-FWS-SSC

**STIPULATION TO EXTEND  
DEFENDANT ELITE CREATOR LLC'S  
TIME TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT**

Judge: Hon. Fred W. Slaughter  
Crtrm: 10D

Complaint Served: 8/05/2024  
Current Response Date: 8/26/2024  
New Response Date: 10/04/2024

STIPULATION TO EXTEND DEFENDANT  
ELITE CREATORS LLC'S TIME TO  
RESPOND TO COMPLAINT  
Case No. 8:24-cv-01655-FWS-SSC

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”) and Defendant Elite  
2 Creators LLC ( “Defendant”) (collectively, the “Parties”), by and through their respective counsel  
3 of record, hereby stipulate and agree to extend the time for Defendant to respond to Plaintiff’s  
4 Complaint [Dkt. No. 1] as follows:

5 WHEREAS, Plaintiffs filed a class action Complaint (“Complaint”) in the above-entitled  
6 action in the United States District Court, Central District of California on July 29, 2024 [Dkt.  
7 No. 1];

8 WHEREAS, Plaintiffs served their Summons and Complaint on the Defendant on  
9 August 5, 2024;

10 WHEREAS, Defendant’s deadline to answer or otherwise respond to the Complaint is  
11 currently August 26, 2024;

12 WHEREAS, Defendant requires, and Plaintiffs have agreed, to an extension of 39 days,  
13 from August 26, 2024 to October 4, 2024, for Defendant to answer or otherwise respond to the  
14 Complaint;

15 WHEREAS, good cause exists because counsel for Defendant was recently retained and  
16 requires additional time to assess the allegations in the Complaint. An extension will allow  
17 Defendant to meaningfully evaluate the Complaint and any response thereto;

18 WHEREAS, an extension will give the Parties sufficient time to discuss the claims and  
19 allegations and to meet and confer as may be needed or desirable on any response;

20 WHEREAS, the Parties mutually agreed to extend the deadline for Defendants to answer  
21 or otherwise respond to the Complaint to October 4, 2024;

22 WHEREAS, there have been no prior extensions of this deadline; and

23 WHEREAS, extending the dates for Defendants to respond to the Complaint, as set forth  
24 herein will not alter the date of any event or deadline already fixed by Court Order.

25 THEREFORE, the Parties hereby stipulate and agree and respectfully request entry of an  
26 order extending Defendant’s deadline to answer or otherwise respond to the Complaint is

1 extended to and including October 4, 2024.

2 **IT IS SO STIPULATED.**

3 Dated: August 23, 2024

Respectfully submitted,

4 DENTONS US LLP

5  
6 By: /s/ Michael Gehret

7 Michael Gehret  
8 Bety Javidzad  
9 Trinity Jordan  
Jordan Westgate  
Samantha Fahr  
Pooja L. Shah

10 Attorneys for Defendant  
11 ELITE CREATORS LLC

12 Dated: August 23, 2024

HAGENS BERMAN SOBOL SHAPIRO  
13 LLP

14  
15 By: /s/ Michella A. Kras

16 Christopher R. Pitoun  
17 Robert B. Carey  
18 Michella A. Kras

19 Attorneys for Plaintiffs  
20 N.Z., R.M., B.L., S.M., and A.L.

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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: August 23, 2024

DENTONS US LLP

By: /s/ Michael Gehret  
Michael Gehret

Attorneys for Defendant  
ELITE CREATORS LLC

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